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22 *and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.)*

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**IN THE UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT) ANTITRUST  
LITIGATION

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

*Sharp Elecs. Corp., et al. v. Hitachi, Ltd., et al.*, No.  
13-cv-01173

**DECLARATION OF JENNIFER M.  
STEWART IN SUPPORT OF SHARP'S  
ADMINISTRATIVE MOTION TO  
SEAL DOCUMENTS PURSUANT TO  
CIVIL LOCAL RULES 7-11 AND 79-  
5(d)**

**[re Panasonic Documents]**

1 I, Jennifer M. Stewart, declare as follows:

2 1. I am an attorney with Winston & Strawn LLP, counsel for Defendants Panasonic  
3 Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a  
4 Matsushita Electric Industrial Co., Ltd.) (collectively, the “Panasonic Defendants”) in these actions.  
5 I am a member of the bar of the State of New York and I am admitted to practice before this Court  
6 *pro hac vice*. Except for those matters stated on information and belief, about which I am informed  
7 and which I believe to be true, I have personal knowledge of the facts stated herein and, if called as a  
8 witness, I could and would competently testify thereto.

9 2. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter  
10 (Dkt. 306). On December 23, 2013, Plaintiffs Sharp Electronics Corporation and Sharp Electronics  
11 Manufacturing Company of America, Inc. (collectively, “Sharp”) filed an Administrative Motion to  
12 Seal (Dkt. 2289), and lodged conditionally under seal its Opposition to Thomson S.A.’s Motion to  
13 Dismiss Sharp’s First Amended Complaint (“Opposition”) pursuant to Civil Local Rules 7-11 and  
14 79-5(d).

15 3. Pursuant to Civil Local Rule 79-5(e), I make this declaration on behalf of the  
16 Panasonic Defendants to provide the basis for the Court to maintain under seal certain documents  
17 and information quoted from, described, or otherwise summarized in Sharp’s Opposition that have  
18 been designated by the Panasonic Defendants as “Confidential” or “Highly Confidential” pursuant to  
19 the Stipulated Protective Order.

20 4. Specifically, Sharp’s Opposition references or quotes directly from (1) portions of its  
21 First Amended Complaint in this matter (Dkt. No. 2030-4), and (2) exhibits designated by the  
22 Panasonic Defendants as “Confidential” or “Highly Confidential” under the terms of the Stipulated  
23 Protective Order. All documents and information sought to be sealed by Sharp’s present  
24 Administrative Motion have previously been subject to administrative motions to file under seal in  
25 this case, and the Court has granted such motions.

26 5. Upon information and belief, the documents and information quoted from, described,  
27 or otherwise summarized in Sharp’s Opposition consist of, cite to, and/or identify confidential,  
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1 nonpublic, proprietary and highly sensitive business information. The Opposition contains, cites,  
 2 and/or identifies confidential information about the Panasonic Defendants' business practices,  
 3 internal practices, business and supply agreements and competitive positions. I am informed and  
 4 believe that this is sensitive information and public disclosure of this information presents a risk of  
 5 undermining the Panasonic Defendants' business relationships, would cause it harm with respect to  
 6 its competitors and customers, and would put the Panasonic Defendants at a competitive  
 7 disadvantage.

8 6. As with the documents themselves, I understand that the Panasonic Defendants  
 9 consider any statements in Sharp's Opposition purporting to summarize any documents or  
 10 information designated "Confidential" or "Highly Confidential" by the Panasonic Defendants  
 11 confidential and proprietary. I am informed and believe that the Panasonic Defendants have taken  
 12 reasonable steps to preserve the confidentiality of information of the type contained, identified, or  
 13 cited to in Sharp's Opposition.

14 I declare under penalty of perjury under the laws of the United States of America that the  
 15 foregoing is true and correct.

16 DATED: December 24, 2013

By: /s/ Jennifer M. Stewart  
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